# EXHIBIT 5

# IN THE UNITED STATES DISTRICT COURT FOR THE SOUTHERN DISTRICT OF TEXAS HOUSTON DIVISION

VIRGINIA ELIZONDO, et al.,	§ Civil Action No. 4:21-CV-01997
Plaintiffs,	§ § SIM LAKE
r unugs,	§ Judge
v.	§
	§ S. Anderson
SPRING BRANCH INDEPENDENT	§ Case Manager Court Reporter
SCHOOL DISTRICT, et al.,	§
	§ Bench Trial
Defendants.	§ Proceeding

## **EXHIBIT LIST OF VIRGINIA ELIZONDO**

Exh No.	Date	Description	Bate/Depo. Exhibit No.	Offered / Admitted	Date	Object	Date Admitted
1	01/20/22	Expert Report of Robert M. Stein, Ph.D.	Stein 1				
2	03/28/22	Supplement to Expert Report of Robert M. Stein, Ph.D., March 28, 2022					
3	10/10/22	Supplement to Expert Report Re: 2022 SBISD Trustee Elections of Robert M. Stein, Ph.D., October 10, 2022					
4	08/21/23	Supplement to Expert Report Re: 2023 SBISD Trustee Elections of Robert M. Stein, Ph.D., August 21, 2023					
<u>5</u>	01/20/22	Expert Report of Andres Tijerina, Ph.D.	Tijerina 1				
<u>6</u>		SBISD Our District, Our Students, Demographics	SBISD 2				
7		2010 – 2021 List/Names of All Candidates	SBISD 3				
8		Map of Memorial Villages	SBISD 4				
9		SBISD Election Precincts/Middle School Enrollment Zones	SBISD 5 SBISD000001				
<u>10</u>		SBISD High School Enrollment Zones	SBISD 6				
11		SBISD Elementary School Enrollment Zones	SBISD 7				
<u>12</u>	05/01/21	SBISD Notice of School Trustee Election	SBISD 8				
13		SBISD Fall Eco Dis Percent in Membership for 2021 for Spring Branch ISD for All Campuses for All Grades	SBISD 10 SBISD000405				

CA NO. 4:21-cv-01997

SBBD Date F-all/Summer by Campus by Ethnicity Race Report Celegrapy SBBD Date F-all/Summer by Campus by Ethnicity Race Report SBBD Date F-all/Summer by SBBD Date SBBD	14	04/05/19	email from R. Rodney to SBISD Board Members and administrators re: Charts you can appreciate, with attachments: "Racial Disparity in Harris County Independent School District," Texas Southern Center for Justice Research and "A Call for Restorative Education Initiatives in the Administration of Discipline in Spring Branch ISD – Report on Discipline and the Disciplinary Alternative Education Program in the Spring Branch ISD," The Coalition of Advocates for Restorative Education	SBISD 11		
SBISD Voter Registration Information by High School   SBISD SBISD 1475	<u>15</u>		1 1 1 1 1 1			
SalsS0000874-975	<u>16</u>		SBISD Police Department Position/EEOC Race/Fiscal Year			
Figure 1. The proportion of vote cast for white candidate and Share of vote   p. 5 of Stein Report	<u>17</u>		SBISD Voter Registration Information by High School			
White   Figure 2. The proportion of vote cast for white candidate and Share of vote   p. 6 of Stein Report	<u>18</u>		Robert M. Stein Curriculum Vitae	pp. 20-31 of Stein Report		
Hispanic   Figure 3, The proportion of vote cast for Hispanic candidate and Share of vote White   Figure 4, The proportion of vote cast for Hispanic candidate and Share of vote Hispanic vote Hispanic   Proposition   Proposit	<u>19</u>			p.5 of Stein Report		
vois White   Figure 4. The proportion of vote cast for Hispanic candidate and Share of   p. 7 of Stein Report	20			p. 6 of Stein Report		
23 Table 1 – Citizen Voting Age Population by SBISD Voting District  24 Demonstrative Spring Branch ISD Single-Member District  25 Table 2 – Percent Enrollment by Race/Ethnicity  26 Spring Branch Ecological Inference Report, Descriptive Analyses and Tables, 2015, 2017, 2018, 2019, 2021SBISD Trustee Elections  27 Andres Tijerina Curriculum Vitae  28 TEA 2022 Accountability Listing - SBISD  29 TEA 2022 Accountability Listing - SBISD  20 City of Hunters Creek Demographics  20 University of South Carolina University History – Wade Hampton College  20 Trustee 6  21 University of South Carolina University History – Wade Hampton College  22 SBISD Trustee Election Carvas Results Report  31 05/01/21 SBISD Trustee Election Precinct Results Report  32 SBISD Trustee Election Precinct Results Report  33 05/01/21 SBISD Trustee Election Precinct Results Report  34 Save SBISD – Trustee Chris Earnest opposes SMD conversion  45 Trustee 15 Earnest 000862  46 Earnest 000862  47 Trustee 15 Earnest 17 Trustee 15 Earnest 17 Trustee 15 Earnest 000862	<u>21</u>			p. 6 of Stein Report		
Demonstrative Spring Branch ISD Single-Member District  Demonstrative Spring Branch ISD Single-Member District  Demonstrative Spring Branch Ecological Inference Report, Descriptive Analyses and Tables, 2015, 2017, 2018, 2019, 2021SBISD Trustee Elections  Spring Branch Ecological Inference Report, Descriptive Analyses and Tables, 2015, 2017, 2018, 2019, 2021SBISD Trustee Elections  Demonstrative Spring Branch Ecological Inference Report, Descriptive Analyses and Tables, 2015, 2017, 2018, 2019, 2021SBISD Trustee Elections  Demonstrative Spring Branch Ecological Inference Report, Descriptive Analyses and Tables, 2015, 2017, 2018, 2019, 2021SBISD Trustee Elections  Demonstrative Spring Branch Ecological Inference Report, Descriptive Analyses and Demonstrative Report  Demonstrative Spring Branch Ecological Inference Report, Descriptive Analyses and Demonstrative Report  Demonstrative Spring Branch Ecological Inference Report Spring Branch Ecological Inference Report Program-perfer Progr	<u>22</u>			p. 7 of Stein Report		
Table 2 - Percent Enrollment by Race/Ethnicity   P. 10 of Stein Report	23		Table 1 – Citizen Voting Age Population by SBISD Voting District	p. 8 of Stein Report		
Spring Branch Ecological Inference Report, Descriptive Analyses and Tables, 2015, 2017, 2018, 2019, 2021SBISD Trustee Elections  Pp. 2-14 of Stein Supplement to Expert Report  Andres Tijerina Curriculum Vitae  TEA 2022 Accountability Listing - SBISD  https://rptsvr1.tea.texas.go //cgisas/broker/_service= marykay&_program=perfee pt.perfinatisas&_debug=0 &cocy=2022lev=D8id=10 19208prgotpt=eports/acct/ as.asa  Trustee 6  University of South Carolina University History – Wade Hampton College  University of South Carolina University History – Wade Hampton College  SBISD Trustee Election Canvas Results Report  SBISD Board Graphic with Demographic Info  Trustee 13  SBISD Trustee Election Precinct Results Report  SBISD Trustee Election Precinct Results Report  SBISD Trustee Election Precinct Results Report  Trustee 14 SBISD000398-404  Save SBISD – Trustee Chris Earnest opposes SMD conversion Trustee 15 Earnest 000962	<u>24</u>		Demonstrative Spring Branch ISD Single-Member District	p. 8 of Stein Report		
Tables, 2015, 2017, 2018, 2019, 2021SBISD Trustee Elections  Supplement to Expert Report  Andres Tijerina Curriculum Vitae  TEA 2022 Accountability Listing - SBISD  Trustee 1.9  Trustee 6  Trustee 6  Trustee 6  Trustee 7  Trustee 7  Trustee 12  SBISD Trustee Election Canvas Results Report  Trustee 12  SBISD Board Graphic with Demographic Info  Trustee 13  SBISD Trustee Election Precinct Results Report  Trustee 14  SBISD000398-404  SBISD Trustee Election Precinct Results Report  Trustee 14  SBISD000398-404  SBISD Trustee Chris Earnest opposes SMD conversion  Trustee 15  Earnest 000962  Trustee 17  Trustee 17	<u>25</u>		Table 2 – Percent Enrollment by Race/Ethnicity	p. 10 of Stein Report		
TEA 2022 Accountability Listing - SBISD    https://rptsvr1.tea.texas.go v/cgi/sas/broker?_service= marykay&_program-perfee pt.permast.sas&_debug=0 &ccyy=202&lev=D&id=10 ls20&py=tepotis/acct/ ca.sas   City of Hunters Creek Demographics   Trustee 6	<u>26</u>			Supplement to Expert		
w/cgi/sas/broker?_service= marykay&_program=perfice pt.perfmast.sas&_debug=0 &cccyy=2022&lev=D&id=10 1920&prgot=reports/acct/ ca.sas  Trustee 6  University of South Carolina University History – Wade Hampton College Trustee 7  University of South Carolina University History – Wade Hampton College Trustee 12 SBISD Trustee Election Canvas Results Report  SBISD Trustee Election Canvas Results Report  Trustee 13  SBISD Board Graphic with Demographic Info Trustee 13  SBISD Trustee Election Precinct Results Report  Trustee 14 SBISD000398-404  Save SBISD – Trustee Chris Earnest opposes SMD conversion Trustee 15 Earnest 000962  Trustee 17	<u>27</u>		Andres Tijerina Curriculum Vitae			
University of South Carolina University History – Wade Hampton College  Trustee 7  31 05/01/21 SBISD Trustee Election Canvas Results Report  SBISD000396  32 SBISD Board Graphic with Demographic Info  Trustee 13  33 05/01/21 SBISD Trustee Election Precinct Results Report  Trustee 14  SBISD000398-404  34 Save SBISD – Trustee Chris Earnest opposes SMD conversion  Trustee 15  Earnest 000962  35 02/11/21 Text message exchange with C. Earnest announcing Pipeline Committee  Trustee 17	<u>28</u>			v/cgi/sas/broker?_service= marykay&_program=perfre pt.perfmast.sas&_debug=0 &ccyy=2022&lev=D&id=10 1920&prgopt=reports/acct/		
31 05/01/21 SBISD Trustee Election Canvas Results Report Trustee 12 SBISD000396  32 SBISD Board Graphic with Demographic Info Trustee 13  33 05/01/21 SBISD Trustee Election Precinct Results Report Trustee 14 SBISD000398-404  34 Save SBISD – Trustee Chris Earnest opposes SMD conversion Trustee 15 Earnest 000962  35 02/11/21 Text message exchange with C. Earnest announcing Pipeline Committee Trustee 17	<u>29</u>		City of Hunters Creek Demographics	Trustee 6		
SBISD000396  32 SBISD Board Graphic with Demographic Info  Trustee 13  33 05/01/21 SBISD Trustee Election Precinct Results Report  Trustee 14 SBISD000398-404  34 Save SBISD – Trustee Chris Earnest opposes SMD conversion  Trustee 15 Earnest 000962  35 02/11/21 Text message exchange with C. Earnest announcing Pipeline Committee  Trustee 17	30		University of South Carolina University History – Wade Hampton College	Trustee 7		
33 05/01/21 SBISD Trustee Election Precinct Results Report Trustee 14 SBISD000398-404  34 Save SBISD – Trustee Chris Earnest opposes SMD conversion Trustee 15 Earnest 000962  35 02/11/21 Text message exchange with C. Earnest announcing Pipeline Committee Trustee 17	<u>31</u>	05/01/21	SBISD Trustee Election Canvas Results Report			
SBISD000398-404  Save SBISD – Trustee Chris Earnest opposes SMD conversion  Trustee 15 Earnest 000962  Trustee 17  Trustee 17	32		SBISD Board Graphic with Demographic Info	Trustee 13		
Earnest 000962  35 02/11/21 Text message exchange with C. Earnest announcing Pipeline Committee Trustee 17	33	05/01/21	SBISD Trustee Election Precinct Results Report			
	34		Save SBISD – Trustee Chris Earnest opposes SMD conversion			
	<u>35</u>	02/11/21	• • • • • • • • • • • • • • • • • • • •	Trustee 17		

CA NO. 4:21-cv-01997

<u>36</u>		"Don't HISD MY SBISD At-Large for Every Child" Photo	Trustee 19			
<u>37</u>		Photo with SBISD and HISD Board Members	Trustee 20			
<u>38</u>	07/10/21	C. Earnest tweet with Earnest children and "Don't HISD My SBISD" sign	Trustee 21			
39	04/23/21	Text message exchange between C. Earnest and B.Muecke re Early	Trustee 24			
		Voting	Earnest000104			
40		Pipeline Steering Committee text message re proximity of SBISD building early voting location and childrens' school	Trustee 25 Earnest000803			
41		Pipeline Steering Committee text message re influence	Trustee 26 Earnest000948			
<u>42</u>		BLANK – For Future Use				
<u>43</u>		Photo of sign on tree in yard of Spring Branch neighborhood home "Traffic Warning: SLOW CHILDREN If you HISD my SBISD"	p. 38 of Tijerina Report			
		Training. 92071 0111251121111 you 11105 my 05105				
44		Table Memorial Villages Anglo Percentage	p. 31 of Tijerina Report			
<u>45</u>		Noel Lezama Resume	Lezama00010			
<u>46</u>	02/01/22	email from N. Marino to N. Lezama re Northbrook softball field vandalism	Lezama00011-14			
47		About Noel Lezama	Lezama00015, 17			
<u>48</u>	11/04/18	screen shot of anonymous election communication	Lezama00020			
<u>49</u>	06/12/18	screen shot of anonymous election communication	Lezama00021			
<u>50</u>	03/17/18	N. Lezama email regarding election activities	Lezama00022			
<u>51</u>		Text message re: "Why I'm voting for David Lopez for Spring Branch ISD School Board"	Lezama00046			
<u>52</u>		David Lopez campaign literature	Lopez000019			
<u>53</u>	4//21/19	D. Lopez email to news@publicmedia.org regarding Spring Branch Election	Lopez000029			
<u>54</u>	07/30/21	D. Tang to D. Lopez email regarding SBISD Single Member Districts	Lopez000031			
<u>55</u>	07/31/21	N. Lezama email re ACTION: Come out to SBISD School Board August 2nd @ 5:00 pm	Lopez000033			
<u>56</u>		David Lopez Vote Early and Election Day Countdown Cards	Lopez001884-1885			
<u>57</u>		David Lopez post-election letter	Lopez001920-1921			
<u>58</u>		David Lopez Opening Statement for Spring Branch Council of PTAs candidates' forum	Lopez001931			
<u>59</u>		David Lopez Talking Points	Lopez001932-1934			
		T .	i I		İ	1

CA NO. 4:21-cv-01997

<u>60</u>		David Lopez statement re school rankings and college readiness at SBISD high schools	Lopez 001937		
<u>61</u>		BLANK – For Future Use			
<u>62</u>		Virginia Elizondo campaign materials	P000001, 2, 3, 6, 7, 9-13, 14-16, 18, 19, 20, 21, 22, 23, 28, 29, 41, 42, 43		
<u>63</u>		Virginia Elizondo post-election materials	P0000039-40		
<u>64</u>	2019-20	2019-20 Texas Academic Performance Report	SBISD000770-797		
<u>65</u>	05/01/21	Early Voting Daily Totals SBISD	SBISD001348		
<u>66</u>	01/13/20	Electoral Systems in Texas 1/13/20 Presentation by Thompson & Horton, LLP to SBISD	SBISD1400-1415		
<u>67</u>	2011-2021	Racial and ethnic composition of teachers, administrative staff and employees of SBISD campuses 2011-2021	SBISD001416-1688		
<u>68</u>	2011-2021	Racial and ethnic composition of SBISD employees who are neither teachers nor administrator 2011-2021	SBISD001689-1699		
<u>69</u>	2011-2021	Racial and ethnic composition of SBISD employees working at Wayne F. Schaper, Sr. Leadership Center (Administration Bldg) 2011-2021	SBISD001700-1705		
<u>70</u>	2011-2021	Racial and ethnic composition of district-wide administrative staff 2011- 2021	SBISD1706-1711		
<u>71</u>	2011-2021	Racial and ethnic composition of certified peace officers in SBISD police department 2011-2021	SBISD001712-1715		
<u>72</u>	1988-2021	Votes Cast in Each Election 1988 – 2021	SBISD001732-1852		
<u>73</u>	2020-2021	2020-21 Texas Academic Performance Report (TAPR)	SBISD001853-1880		
<u>74</u>		Text message regarding PIPEline candidate endorsement	SBISD007065-7066		
<u>75</u>		Text message regarding PIPEline political action committee and endorsements	SBISD007077-7079		
<u>76</u>	02/01/22	email and photos re vandalism of Northbrook softball field	SBISD0007154-7162		
<u>77</u>	10/04/21	email from Somos Spring Branch re Somos Spring Branch: Requests	SBISD006298-6301		
<u>78</u>	08/13/2021 - 09/02/21	email exchange with SBISD regarding early voting locations	SBISD005822-5826		
<u>79</u>		TEA 2019 SBISD Accountability Rating Table	P000700-701		
80		Pipeline text re role of early voting	Earnest000748-749		
<u>81</u>	04/28/21	text message re "How did a pair of Aggies become Communists???"	Goodson000001		
<u>82</u>		Comparing the Candidates – Position 4 Who's most prepared & committed to SBISD	Goodson000038		
	1	<u>!</u>			

CA NO. 4:21-cv-01997

<u>83</u>	1026 Districts, Vastly Different Demographics	P000702-705		
84	2022 Accountability System Overview	P000706		
<u> </u>	2522 / Isocamazimi, Cyclem C 16/11011			
<u>85</u>	Noel Lezama Letter - Diversity, History, Success	P000707-710		
<u>86</u>	Demographics - October 2022	P000711		
87	SBISD 2022 General and Special Election Results	SBISD007556-007577		
_	·			
88	SBISD 2023 General and Special Election Results	SBISD007937-7939		
90	2022 Statewide Accountability Ratings	P000712		
89	2022 Statewide Accountability Ratings	F000712		
90				
01				
91				
92				
00				
93				
94				
<u>95</u>				
<u>96</u>				
<u> </u>				
<u>97</u>				
00				
98				
99	+			
100				
101				
102				
102				
103				
104				
105				
106				
106				
		·		

107			
108			
109			
110			
111			
112			
113			
114			
115			

### Respectfully submitted,

### /s/Barry Abrams

Barry Abrams State Bar No. 00822700 SD Tex. Bar No. 2138 Robert Scott State Bar No. 17911800 SD Tex. Bar No. 3085 Domingo Llagostera State Bar No. 24070157 SD Tex. Bar No. 1120040 BLANK ROME LLP 717 Texas Avenue, Suite 1400 Houston, Texas 77002 (713) 228-6606 (713) 228-6605 (fax) barry.abrams@blankrome.com bob.scott@blankrome.com

domingo.llagostera@blankrome.com

Martin Golando
State Bar No. 24059153
Admitted Pro Hac Vice
THE LAW OFFICE OF MARTIN GOLANDO, PLLC
2326 W. Magnolia
San Antonio, Texas 78201
(210) 471-1185
(210) 405-6772 (fax)
martin.golando@gmail.com

#### **CERTIFICATE OF SERVICE**

I certify that the foregoing document was served on all parties of record via the Court's electronic filing system on October 6, 2023

/s/Barry Abrams	
Barry Abrams	

# IN THE UNITED STATES DISTRICT COURT FOR THE SOUTHERN DISTRICT OF TEXAS HOUSTON DIVISION

VIRGINIA ELIZONDO, et al.,	§ Civil Action No. 4:21-CV-01997
Plaintiffs,	§ § <u>SIM LAKE</u>
	§ Judge
V.	§
	§ S. Anderson
SPRING BRANCH INDEPENDENT	§ Case Manager Court Reporter
SCHOOL DISTRICT, et al.,	§
	§ Bench Trial
Defendants.	§ Proceeding

## **EXHIBIT LIST OF VIRGINIA ELIZONDO**

Exh No.	Date	Description	Bate/Depo. Exhibit No.	Offered / Admitted	Date	Object	Date Admitted
1	01/20/22	Expert Report of Robert M. Stein, Ph.D.	Stein 1				
2	03/28/22	Supplement to Expert Report of Robert M. Stein, Ph.D., March 28, 2022					
3	10/10/22	Supplement to Expert Report Re: 2022 SBISD Trustee Elections of Robert M. Stein, Ph.D., October 10, 2022					
4	08/21/23	Supplement to Expert Report Re: 2023 SBISD Trustee Elections of Robert M. Stein, Ph.D., August 21, 2023					
<u>5</u>	01/20/22	Expert Report of Andres Tijerina, Ph.D.	Tijerina 1				
<u>6</u>		SBISD Our District, Our Students, Demographics	SBISD 2				
7		2010 – 2021 List/Names of All Candidates	SBISD 3				
8		Map of Memorial Villages	SBISD 4				
9		SBISD Election Precincts/Middle School Enrollment Zones	SBISD 5 SBISD000001				
<u>10</u>		SBISD High School Enrollment Zones	SBISD 6				
11		SBISD Elementary School Enrollment Zones	SBISD 7				
<u>12</u>	05/01/21	SBISD Notice of School Trustee Election	SBISD 8				
13		SBISD Fall Eco Dis Percent in Membership for 2021 for Spring Branch ISD for All Campuses for All Grades	SBISD 10 SBISD000405				

CA NO. 4:21-cv-01997

<u>14</u>	04/05/19	email from R. Rodney to SBISD Board Members and administrators re: Charts you can appreciate, with attachments: "Racial Disparity in Harris County Independent School District," Texas Southern Center for Justice Research and "A Call for Restorative Education Initiatives in the Administration of Discipline in Spring Branch ISD – Report on Discipline and the Disciplinary Alternative Education Program in the Spring Branch ISD," The Coalition of Advocates for Restorative Education	SBISD 11				
<u>15</u>		SBISD Staff – Fall/Summer by Campus by Ethnicity Race Report Category	SBISD 12 SBISD000799-806				
<u>16</u>		SBISD Police Department Position/EEOC Race/Fiscal Year	SBISD 13 SBISD000807-816				
<u>17</u>		SBISD Voter Registration Information by High School	SBISD 14 SBISD000874-875				
<u>18</u>		Robert M. Stein Curriculum Vitae	pp. 20-31 of Stein Report				
<u>19</u>		Figure 1, The proportion of vote cast for white candidate and Share of vote White	p.5 of Stein Report				
<u>20</u>		Figure 2, The proportion of vote cast for white candidate and Share of vote Hispanic	p. 6 of Stein Report				
<u>21</u>		Figure 3, The proportion of vote cast for Hispanic candidate and Share of vote White	p. 6 of Stein Report				
<u>22</u>		Figure 4, The proportion of vote cast for Hispanic candidate and Share of vote Hispanic	p. 7 of Stein Report				
<u>23</u>		Table 1 – Citizen Voting Age Population by SBISD Voting District	p. 8 of Stein Report				
<u>24</u>		Demonstrative Spring Branch ISD Single-Member District	p. 8 of Stein Report				
<u>25</u>		Table 2 – Percent Enrollment by Race/Ethnicity	p. 10 of Stein Report				
<u>26</u>		Spring Branch Ecological Inference Report, Descriptive Analyses and Tables, 2015, 2017, 2018, 2019, 2021SBISD Trustee Elections	pp. 2-14 of Stein Supplement to Expert Report				
<u>27</u>		Andres Tijerina Curriculum Vitae					
28		TEA 2022 Accountability Listing - SBISD	https://rptsvr1.tea.texas.go v/cgi/sas/broker?_service= marykay&_program=perfre pt.perfmast.sas&_debug=0 &ccyy=2022&lev=D&id=10 1920&prgopt=reports/acct/ ca.sas				
<u>29</u>		City of Hunters Creek Demographics	Trustee 6				
30		University of South Carolina University History – Wade Hampton College	Trustee 7				
<u>31</u>	05/01/21	SBISD Trustee Election Canvas Results Report	Trustee 12 SBISD000396				
32		SBISD Board Graphic with Demographic Info	Trustee 13				
33	05/01/21	SBISD Trustee Election Precinct Results Report	Trustee 14 SBISD000398-404				
<u>34</u>		Save SBISD – Trustee Chris Earnest opposes SMD conversion	Trustee 15 Earnest 000962				
<u>35</u>	02/11/21	Text message exchange with C. Earnest announcing Pipeline Committee endorsement	Trustee 17				
	1	L	l	L	l	<u> </u>	ı

CA NO. 4:21-cv-01997

<u>36</u>		"Don't HISD MY SBISD At-Large for Every Child" Photo	Trustee 19			
<u>37</u>		Photo with SBISD and HISD Board Members	Trustee 20			
<u>38</u>	07/10/21	C. Earnest tweet with Earnest children and "Don't HISD My SBISD" sign	Trustee 21			
39	04/23/21	Text message exchange between C. Earnest and B.Muecke re Early	Trustee 24			
		Voting	Earnest000104			
40		Pipeline Steering Committee text message re proximity of SBISD building early voting location and childrens' school	Trustee 25 Earnest000803			
41		Pipeline Steering Committee text message re influence	Trustee 26 Earnest000948			
<u>42</u>		BLANK – For Future Use				
<u>43</u>		Photo of sign on tree in yard of Spring Branch neighborhood home "Traffic Warning: SLOW CHILDREN If you HISD my SBISD"	p. 38 of Tijerina Report			
		Training. 92071 0111251121111 you 11105 my 05105				
44		Table Memorial Villages Anglo Percentage	p. 31 of Tijerina Report			
<u>45</u>		Noel Lezama Resume	Lezama00010			
<u>46</u>	02/01/22	email from N. Marino to N. Lezama re Northbrook softball field vandalism	Lezama00011-14			
47		About Noel Lezama	Lezama00015, 17			
<u>48</u>	11/04/18	screen shot of anonymous election communication	Lezama00020			
<u>49</u>	06/12/18	screen shot of anonymous election communication	Lezama00021			
<u>50</u>	03/17/18	N. Lezama email regarding election activities	Lezama00022			
<u>51</u>		Text message re: "Why I'm voting for David Lopez for Spring Branch ISD School Board"	Lezama00046			
<u>52</u>		David Lopez campaign literature	Lopez000019			
<u>53</u>	4//21/19	D. Lopez email to news@publicmedia.org regarding Spring Branch Election	Lopez000029			
<u>54</u>	07/30/21	D. Tang to D. Lopez email regarding SBISD Single Member Districts	Lopez000031			
<u>55</u>	07/31/21	N. Lezama email re ACTION: Come out to SBISD School Board August 2nd @ 5:00 pm	Lopez000033			
<u>56</u>		David Lopez Vote Early and Election Day Countdown Cards	Lopez001884-1885			
<u>57</u>		David Lopez post-election letter	Lopez001920-1921			
<u>58</u>		David Lopez Opening Statement for Spring Branch Council of PTAs candidates' forum	Lopez001931			
<u>59</u>		David Lopez Talking Points	Lopez001932-1934			
		T .	i I		İ	1

CA NO. 4:21-cv-01997

<u>60</u>		David Lopez statement re school rankings and college readiness at SBISD high schools	Lopez 001937		
<u>61</u>		BLANK – For Future Use			
<u>62</u>		Virginia Elizondo campaign materials	P000001, 2, 3, 6, 7, 9-13, 14-16, 18, 19, 20, 21, 22, 23, 28, 29, 41, 42, 43		
<u>63</u>		Virginia Elizondo post-election materials	P0000039-40		
<u>64</u>	2019-20	2019-20 Texas Academic Performance Report	SBISD000770-797		
<u>65</u>	05/01/21	Early Voting Daily Totals SBISD	SBISD001348		
<u>66</u>	01/13/20	Electoral Systems in Texas 1/13/20 Presentation by Thompson & Horton, LLP to SBISD	SBISD1400-1415		
<u>67</u>	2011-2021	Racial and ethnic composition of teachers, administrative staff and employees of SBISD campuses 2011-2021	SBISD001416-1688		
<u>68</u>	2011-2021	Racial and ethnic composition of SBISD employees who are neither teachers nor administrator 2011-2021	SBISD001689-1699		
<u>69</u>	2011-2021	Racial and ethnic composition of SBISD employees working at Wayne F. Schaper, Sr. Leadership Center (Administration Bldg) 2011-2021	SBISD001700-1705		
<u>70</u>	2011-2021	Racial and ethnic composition of district-wide administrative staff 2011- 2021	SBISD1706-1711		
<u>71</u>	2011-2021	Racial and ethnic composition of certified peace officers in SBISD police department 2011-2021	SBISD001712-1715		
<u>72</u>	1988-2021	Votes Cast in Each Election 1988 – 2021	SBISD001732-1852		
<u>73</u>	2020-2021	2020-21 Texas Academic Performance Report (TAPR)	SBISD001853-1880		
<u>74</u>		Text message regarding PIPEline candidate endorsement	SBISD007065-7066		
<u>75</u>		Text message regarding PIPEline political action committee and endorsements	SBISD007077-7079		
<u>76</u>	02/01/22	email and photos re vandalism of Northbrook softball field	SBISD0007154-7162		
<u>77</u>	10/04/21	email from Somos Spring Branch re Somos Spring Branch: Requests	SBISD006298-6301		
<u>78</u>	08/13/2021 - 09/02/21	email exchange with SBISD regarding early voting locations	SBISD005822-5826		
<u>79</u>		TEA 2019 SBISD Accountability Rating Table	P000700-701		
80		Pipeline text re role of early voting	Earnest000748-749		
<u>81</u>	04/28/21	text message re "How did a pair of Aggies become Communists???"	Goodson000001		
<u>82</u>		Comparing the Candidates – Position 4 Who's most prepared & committed to SBISD	Goodson000038		
Щ_	1	ļ		 1	

CA NO. 4:21-cv-01997

83	1026 Districts, Vastly Different Demographics	P000702-705		
84	2022 Accountability System Overview	P000706		
<u>85</u>	Noel Lezama Letter - Diversity, History, Success	P000707-710		
<u>86</u>	Demographics - October 2022	P000711		
<u>87</u>	SBISD 2022 General and Special Election Results	SBISD007556-007577		
88	SBISD 2023 General and Special Election Results	SBISD007937-7939		
<u>89</u>	2022 Statewide Accountability Ratings	P000712		
	2022 Statewide Accountability Natings	1 0007 12		
90				 
<u>91</u>				
92				
93				
94				
<u>95</u>				
<u>96</u>				
<u>97</u>				
98				
99				
100				
101				
102				
103				
104				
105				
106				

CA NO. 4:21-cv-01997

Page No. 6

107			
108			
109			
110			
111			
112			
113			
114			
115		 	

### Respectfully submitted,

### /s/Barry Abrams

Barry Abrams State Bar No. 00822700 SD Tex. Bar No. 2138 Robert Scott State Bar No. 17911800 SD Tex. Bar No. 3085 Domingo Llagostera State Bar No. 24070157 SD Tex. Bar No. 1120040 BLANK ROME LLP 717 Texas Avenue, Suite 1400 Houston, Texas 77002 (713) 228-6606 (713) 228-6605 (fax) barry.abrams@blankrome.com bob.scott@blankrome.com

domingo.llagostera@blankrome.com

Martin Golando
State Bar No. 24059153
Admitted Pro Hac Vice
THE LAW OFFICE OF MARTIN GOLANDO, PLLC
2326 W. Magnolia
San Antonio, Texas 78201
(210) 471-1185
(210) 405-6772 (fax)
martin.golando@gmail.com

#### **CERTIFICATE OF SERVICE**

I certify that the foregoing document was served on all parties of record via the Court's electronic filing system on October 6, 2023

/s/Barry Abrams	
Barry Abrams	